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EX PARTE OR LATE FILED

July 21, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary - Room TWB-204
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte: CC Docket No. 98-121

Dear Ms. Salas:

On June 21, 1999, I faxed the attached letter and matrix to Andrea Kearney, of the Common Carrier Bureau's Policy and Program Planning Division. Please include this filing in the record of the above-referenced proceedings.

Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Karen T. Reidy

Karen T. Reidy

Attachments

cc: Andrea Kearney

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July 21, 1999

Ms. Andrea Kearney
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Dear Andrea:

Attached is a matrix that provides a comparison of the third-party test plan that is being implemented in Georgia to the list of necessary elements of a third party test MCI WorldCom previously submitted to the Commission. We are also in agreement with the ex parte submitted by AT&T on July 2, 1999, and have not repeated each of the points in that ex parte in our submission.

The elements identified in the attached matrix are necessary to open local markets, as well as ensure the test provides useful and credible evidence of BellSouth providing nondiscriminatory access to network elements as required by sections 251 and 271 of the Act. The importance of these elements is demonstrated by the success of the third party test in New York in identifying deficiencies in Bell Atlantic's OSS. The identification and ongoing resolution of these deficiencies is resulting in substantial improvements in Bell Atlantic's systems, enabling MCI WorldCom to begin to offer residential service in New York.

BellSouth's test plan incorporates some of necessary elements, but the plan is lacking in a number of critical aspects. Some important aspects that are contributing to the success of the New York test are that the tester developed the plan and the process is an open one, providing some assurance that the testers are actually encountering the same experience competitors will when attempting to enter the market. For Georgia, BellSouth (or someone acting under its direction) developed the plan with no input from the CLECs. In addition, BellSouth does not offer the full combination of elements to the CLECs that will be tested by the third party tester. Therefore it is impossible to determine if CLECs will be able to enter the market under the same circumstances that the tester is provided.

Furthermore, OSS 99, which includes enhancements made to EDI ordering interfaces, must be tested. OSS 99 is expected to be the ordering interface CLECs use when they actually enter the local market on a broad scale. It is our understanding that the business rules are complete, so the testers could immediately begin building to the interface and testing it. It is a waste of time and resources to test only the interfaces that will soon be obsolete.

OSS 99 includes a number of new or enhanced functionalities that are lacking in EDI 7.0 (on which MCI WorldCom believes EDI PC to be based). Important examples include ordering for loop-port combinations, which MCI WorldCom understands will comply with current industry standards, and ordering for partial migrations, which will be improved. Other significant enhancements include:

- Capability to send jeopardy notifications
- Updated directory listings capabilities
- Updated Completion notifications
- Updated Firm Order Confirmations
- Capability to order digital loop service (note: may not be supported in OSS 99 phase 1)
- PIC/LPIC enhancements
- Updated or added forms
  - -- LSR (local service order)
  - -- EU (end user)
  - -- LS (loop service)
  - -- LSNP (loop service with number portability
  - -- NP (number portability)
  - -- PS (port service)
  - -- RS (resale service)
  - -- Local service request confirmation
- Hunting capabilities
- DID Resale
- ISDN
- Blocking enhancements

Thus, for a test to have any significant value, the testing of OSS 99 should be part of the test plan.

Please call me with any further questions you may have. We would be happy to meet with you to discuss our concerns.

Sincerely,

Karen T. Reidy

Karen T. Reidy

Attachment

cc: Carol Mattey
William Agee

July 1999

Comparison of the Georgia OSS Test Plan to Key Elements of Independent, Third-Party OSS Testing

Key Elements of Third Party OSS Test	Current Status of Third Party OSS Test in Plan Georgia
Role of Third Party. Reliance on an independent, technically-skilled third party to develop the test, conduct it, monitor the results, oversee corrections and retest, and report on the test will expedite the identification and resolution of problems with the BOC's operations support systems (OSS), as well as clarify complex facts for accurate decision-making by state and federal regulatory agencies.	BellSouth has elected KPMG to audit the test process and report on the testing results, and chose Hewlett Packard (HP) to conduct feature, function and volume tests on the interfaces being tested under the plan. KPMG and HP have demonstrated themselves to be skilled and objective testers. KPMG and HP, however, did not design the test plan; the test plan was designed by BellSouth or another firm acting at BellSouth's direction. BellSouth's involvement in the designing taints the independence and objectivity of the test and limits the testers' ability to detect OSS problems. BellSouth appears to have designed the test to focus on what it perceives to be the strengths of its OSS and to mask known or possible weaknesses. An independent, objective third party should create the plan and test all service delivery methods.
Clearly Define Test Plan. The third party should develop the test plan, working with the interested parties. The test plan should clearly define the scope and methodology of the test, and the entry and exit criteria.	The plan was developed by BellSouth without input from CLECs. The plan is vague in some key areas. For example, the plan states it is "military style testing" but leaves open what the exception reporting process will be for identifying, assigning, resolving and escalating defects. The plan simply states that BellSouth, KPMG and HP must agree on such a process. Also, the plan leaves open the performance metrics and standards that will be used.

Performance Measurement Validation. ***The BOC's performance measurement system must be validated by the third party closely analyzing how the BOC generates performance reports, what raw data the BOC relies on, what methodologies the BOC uses, and what assumptions the BOC makes for each measurement it reports. This validation process is critical given the great reliance regulators place on performance reports, and the BOC's clear incentive to create reports that demonstrate parity. The test results must then be measured against pre-established performance standards.***	The performance measurement system to be employed has not been tested and validated by the testers. As stated above, performance metrics and standards have not been defined. The plan also fails to call for a review of BellSouth's retail operations and results to determine what is required to establish parity. To make matters worse, there is no established proceeding to allow for CLEC comments as to metrics, standards, and processes used during the testing. The plan calls for only some flow through reports to be audited. All performance measurement reports should be audited by the testers.
Build Interfaces to Test Documentation. ***The third party should build all necessary OSS interfaces to determine whether the BOC's documentation is sufficient to permit CLECs to develop their OSS in order to enter the market across the range of order types.*** ***The test systems can be built more quickly and cheaply than CLEC systems because they are not integrated into real back-end business operations and need not be as large and robust as actual commercial systems.*** ***The third party should test and review all supporting documentation for OSS and processes, including business rules, EDI specifications, BOC handbooks on which CLECs must rely, and other materials. Final specifications and business rules should be tested by the third party to make sure any CLEC could build an interface based only on the documentation, since BOCs will have no incentive to rapidly cure documentation problems after obtaining section 271 authorization.***	The plan does not call for the testers to build all necessary OSS interfaces. Instead, the testers assess BellSouth's documentation by reviewing the documentation and interviewing personnel from BellSouth and CLECs. A tester building to OSS 99 would provide a good analysis of sufficiency of the documentation for that system.

Change Management. The third party should evaluate change management processes by reviewing actual notices, such as modifications to business rules, to ensure the BOC is complying with established procedures. The third party should also verify that the Quality Assurance environment precisely mirrors the production environment.	BellSouth's plan calls for the assessment of change management only through review of documentation and interviews. The test does not "test" change management because it does not provide for the observation of what transpires between BellSouth and CLECs when BellSouth makes changes to its OSS. BellSouth even notes that it "will maintain a stable OSS environment for the duration of the test." But new entrants will not experience this stability when entering the market. BellSouth's release of OSS 99 system would provide a good vehicle for the testing of change management.
Open Process. CLECs should be given access to all materials and assistance provided by the BOC to the third party, to ensure that the development by the third party can be duplicated by competitors in the real world. Minutes should be kept of all contacts between the third party and the BOC and made available to the CLECs. ***CLEC monitoring of the test ensures that current versions of systems/documentation are being tested and ensures that the third party is not receiving assistance and cooperation the CLECs will not be able to enjoy following section 271 authorization.***	This test calls for a closed process. CLECs have no involvement in the process except to be permitted to see and comment on the interim and final KPMG reports. BellSouth states that tools and documentation made available to the testers are or will be publicly available. The tester should not be provided any information, resources, or assistance not available to new entrants. CLEC involvement in the testing process is necessary to verify this.
Test All Functionalities. The OSS test must be end-to-end, and thoroughly test pre-ordering, ordering, provisioning, maintenance and repair, and billing, including integration of pre-ordering and ordering. The FCC's orders have required proof of access to these functions, all of which are imperative for full scale commercial operation by competitors.	UNEs will not be tested end-to-end over the full range of pre-ordering, ordering, provisioning, billing, maintenance and repair processes. The test also neglects to evaluate support functions such as Account Team, network design requests, help desk functions, and CLEC training.

Pre-order should include the testing of functions such as address validation, CSR availability, USOC availability, numbering resource availability, due date interval and availability, editing capabilities, systems integration capabilities, telephone number verification, current PIC status verification, and facilities availability.	The test plan does not call for the testing of various pre-ordering functions through an application-to-application EDI interface. Integration of pre-ordering with ordering is crucial for large scale market entry.
Order functionalities tested should include access to product and service offerings for both simple and complex orders and promotions, performance of the provisioning and order status reports, editing capabilities and the integration of ordering systems with other systems.	The plan does not call for testing of the OSS 99 ordering interfaces that BellSouth plans to bring on line in September 1999. These interfaces are expected to adopt current industry guidelines and add substantial new functionality. OSS 99 should be tested.
Provisioning is important to make sure that a sizeable quantity of orders are run through the system from start to finish and actually provisioned.	The plan does not specify the quantity of orders that will be provisioned.
Maintenance and Repair should include the implementation of the electronic bonding interface, and test functionalities including OSS interface availability, average OSS response interval, average answer time - repair, missed repair appointments, customer trouble report rate, maintenance average duration, percent repeat troubles (within 30 days) and out of service greater than 24 hours.	The plan calls for a test of the maintenance and repair systems but does not call for an assessment of actual performance of maintenance and repair. Having a neutral third party assess the timing and quality of the service provides credibility.

Billing testing should include invoice accuracy, invoice timeliness, usage data delivery accuracy, usage data delivery timeliness and completeness, and ability to capture usage data for all calls including local and access. The test should also include an audit of the BOC's end-user billing, wholesale billing, reciprocal compensation billing, and access billing. The test should cover three complete billing cycles, which can be compressed in time within the BOC's systems	The test only covers two billing cycles. It is not clear if the test includes an audit of end-user billing, reciprocal compensation billing and access billing.
Test Scenarios. Detailed test scenarios must be developed by the third party for the test, including specific order and customer information. The BOC must not design the test scenarios.	BellSouth designed the test scenarios, and appears to have chosen scenarios designed to test what BellSouth perceives to be the strengths of its OSS and not on known or possible weaknesses. For example, these scenarios do not test all of the April 1, 1999 system upgrades, such as the ability to process total or partial migration orders that leave a customer's directory listing as is.
Full Range of Orders. The test should cover the full range of orders that would permit all modes of market entry including, but not limited to, UNE combinations. This is needed to ensure that OSS for all methods of entry contemplated by the Telecommunications Act is available to CLECs regardless of whether other barriers currently prevent CLECs from entering the local market.	The test scenarios do not include a number of typical UNE loop with LNP, and UNE LNP orders. The plan should, and it appears will, cover an order for the combination of the following unbundled elements: NID, loop, port, central office, tandem, switching, transport, signaling, and databases, operator services and directory assistance. BellSouth, however, has not made this combination available to new entrants. Even if BellSouth eventually makes these combined elements available to CLECs, the test will be pointless if the identical circumstances are not present for CLECs. For example, in New York the concurrent testing revealed occasions of preferred treatment or additional information being provided to the tester.

Realistic Mix of Orders. The test should involve the types of orders that are likely in a competitive environment, and CLECs should be able to provide input to the third party.	The third party tester should design the test scenarios, with input from CLECs, to ensure a broad range of scenarios based on expected market entry strategies.
xDSL OSS Capabilities. Due to the rapidly developing market for broadband and data services, BOC support for all types of xDSL is vital to the future of competition and should be tested as fully as possible. In particular, access to loop qualification and BOC bandwidth management information must be tested, along with other xDSL specific systems.	The plan does not test xDSL, spectrum management, and access to bandwidth and other information regarding the makeup of the loop.
Submission of Orders. The third party should develop, submit, and track the Local Service Requests (LSRs) based on BOC provided documentation.	Given the closed process, CLECs cannot verify what sources the testers are using to develop orders.
Test Bed. A large quantity of numbers is needed for the test, and information related to the numbers must be reviewed to ensure that the BOC is not distorting the results of the test by providing "clean" data, or else problems will not be identified which will hinder local competition.	The plan does not specify the quantity of accounts that will comprise the test bed.
Stress Test. A volume stress test appropriate to the market should be required over multiple days. Stress testing should occur at commercial volumes, as determined by the expected future demand in a competitive local market in which multiple CLECs are operating at full production. The days of stress testing should not be known by the BOC.	The plan states that the volumes to be tested will be based on certain projections; actual volumes are not specified. The plan calls for coordination between BellSouth and the test cycle manager for volume testing, so it appears BellSouth will be aware of the timing of the test. BellSouth should not be aware of the testing days.

"Blind" Testing. For a valid test, the BOC should not be involved in determining the specific details of the test, such as the precise scenarios to be tested. For volume testing, orders should be submitted to the BOC without it knowing when they will arrive, to avoid the BOC being prepared only on the specific days of the test. To the greatest extent possible, the test should match market conditions in which the BOC should be able to respond adequately to the unanticipated ordering and related activities of multiple CLECs.	BellSouth, not the tester, has mapped out the scenarios to be used during the peak volume test.
Collocation. The processes for ordering and obtaining CLEC collocation within BOC end offices must be tested.	Collocation is not included in the scope of the Georgia test.
Documentation and Tracking. Beginning with formulation of the test plan and continuing through the testing process, issues that arise should be fully documented with a system to monitor and track them, so that important matters are not overlooked. The third party should provide written documentation of problems uncovered in the test (which may be called "Exception Reports") on which the BOC and other parties are permitted to comment, and which are resolved and formally closed through established procedures.	As noted above, this process is not fully defined. Instead of providing detailed explanation of problems including the specific impact on the consumers and competitors, the plan categorized the deficiency base on the severity level. Having "exception reports" that fully describe the problem and impact, publicly accessible on a neutral web site, ensures all interested parties are aware of the issues. This will enable them to provide comments on how this deficiency will impact their current business or market entry plans of which the tester may not be aware. In addition, fully describing the problem ensures that the fix does not just whitewash the problem, but rather eliminates the negative impact to the consumers and new entrant.

"Regression" Testing after Problems Found. ***The third party should retest any fixes that are made by the BOC to ensure both that the problem has been fixed and that no other problem has been created by the change. Adequate regression testing should be part of the test plan for closing Exception Reports, after receiving comments on the fixes from interested parties. Regression testing is the only way to ensure that workable OSS will exist at the end of the testing process.***	As noted above, this process is not defined. Also, if BellSouth continues to refuse to test the OSS 99 ordering interface, it must not be allowed to excuse any problems encountered by stating that they will be fixed with their OSS 99 EDI enhancements.
Proof, Not Promises. The goal of testing is to find and fix problems that would prevent local competition, rather than relying on promises of adequate performance. The BOC must demonstrate that the problems have been resolved before the test is completed.	The test must ensure that BellSouth is providing a workable OSS that will allow competitors to enter the market. This will be impossible without testing the OSS 99 ordering interface that CLECs actually will be using to enter the market.